

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS**

BENJAMIN MONDRAGON,

Plaintiff,

v.

CREDIT ONE BANK, N.A.,

Defendant.

Case No. 5:18-cv-408

**JOINT STIPULATION TO ARBITRATE
CLAIMS AND STAY LAWSUIT**

Plaintiff Benjamin Mondragon (“Plaintiff”) and Defendant Credit One Bank, N.A. (“Credit One”) (collectively, “the Parties”), by and through their undersigned counsel, hereby submit this Joint Stipulation to Arbitrate Claims and Stay Lawsuit, as follows:

1. The Parties have agreed to submit all of the claims between each other in this lawsuit to arbitration pursuant to the Parties’ arbitration agreement. The arbitration shall be conducted through and in accordance with the arbitration agreement.
2. The Parties therefore respectfully request that (a) this Court order that all of the claims in this lawsuit between the Parties be submitted to binding, non-judicial arbitration pursuant to the Parties’ arbitration agreement, and (b) that the case be stayed pending the conclusion of the arbitration.

Dated: July 13, 2018

Respectfully submitted,

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Certificate of Service

I certify that this instrument was electronically served on counsel of records for all parties on July 13, 2018 via the Court's ECF system.

/s/ Michael H. Bernick
Michael H. Bernick